

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CAMBRIDGE PLACE INVESTMENT
MANAGEMENT INC.,

Plaintiff,

v.

MORGAN STANLEY & CO., INC.;
CITIGROUP GLOBAL MARKETS INC.;
CREDIT SUISSE SECURITIES (USA) LLC;
RBS SECURITIES, INC.; DEUTSCHE BANK
SECURITIES, INC.; MERRILL LYNCH,
PIERCE, FENNER & SMITH, INC.; UBS
SECURITIES LLC; GOLDMAN, SACHS &
CO.; J.P. MORGAN SECURITIES INC.;
COUNTRYWIDE SECURITIES
CORPORATION; FBR CAPITAL MARKETS
& CO., HSBC SECURITIES (USA), INC.;
BANC OF AMERICA SECURITIES LLC;
RESIDENTIAL FUNDING SECURITIES,
LLC; BARCLAYS CAPITAL INC.;
ACCREDITED MORTGAGE LOAN REIT
TRUST; ACE SECURITIES CORPORATION;
AEGIS ASSET BACKED SECURITIES
CORPORATION; AMERICAN HOME
MORTGAGE ASSETS LLC.; AMERIQUEST
MORTGAGE SECURITIES INC.; ARGENT
SECURITIES INC.; ASSET BACKED
FUNDING CORPORATION; ASSET BACKED
SECURITIES CORPORATION; BANC OF
AMERICA MORTGAGE SECURITIES, INC.;
BCAP LLC; BEAR STEARNS ASSET
BACKED SECURITIES I LLC; CITIGROUP
MORTGAGE LOAN TRUST INC.; CREDIT
SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP.; CWABS, INC.; CWALT,
INC.; FBR SECURITIZATION, INC.;
FIELDSTONE MORTGAGE INVESTMENT
CORPORATION; FINANCIAL ASSET
SECURITIES CORP.; FREMONT
MORTGAGE SECURITIES CORPORATION;
GS MORTGAGE SECURITIES CORP.; HSI
ASSET SECURITIZATION CORPORATION;

Civil Action No. 1:10-cv-11376-NMG

**DEFENDANTS' PROPOSED NOTICE
OF DEPOSITION PURSUANT TO
FED. R. CIV. P. 30(b)(6)**

J.P. MORGAN ACCEPTANCE CORPORATION I; LONG BEACH SECURITIES CORP.; MERRILL LYNCH MORTGAGE INVESTORS, INC.; MORGAN STANLEY ABS CAPITAL I INC.; MORGAN STANLEY CAPITAL I INC.; MORTGAGE ASSET SECURITIZATION TRANSACTIONS, INC.; NATIONSTAR FUNDING LLC; NEW CENTURY MORTGAGE SECURITIES LLC; NEW CENTURY MORTGAGE SECURITIES, INC.; NOVASTAR MORTGAGE FUNDING CORPORATION; PARK PLACE SECURITIES, INC.; PEOPLE'S CHOICE HOME LOAN SECURITIES CORP.; POPULAR ABS, INC.; RESIDENTIAL ACCREDIT LOANS, INC.; RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.; RESIDENTIAL ASSET SECURITIES CORPORATION; SACO I INC.; SAXON ASSET SECURITIES COMPANY; SECURITIZED ASSET BACKED RECEIVABLES LLC; STANWICH ASSET ACCEPTANCE COMPANY, L.L.C.; STRUCTURED ASSET MORTGAGE INVESTMENTS II INC.; and WASHINGTON MUTUAL MORTGAGE SECURITIES CORP.

Defendants.

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PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Barclays Capital Inc., BCAP LLC, Securitized Asset Backed Receivables LLC, Credit Suisse Securities (USA) LLC, Credit Suisse First Boston Mortgage Securities Corp., Asset Backed Securities Corporation, Goldman, Sachs & Co., GS Mortgage Securities Corp., Morgan Stanley & Co. Incorporated, Morgan Stanley ABS Capital I Inc., Morgan Stanley Capital I Inc., Saxon Asset Securities Company, Citigroup Global Markets Inc., Citigroup Mortgage Loan Trust Inc., UBS Securities LLC, Mortgage Asset Securitization Transactions, Inc., Banc of America Securities LLC, Banc of America Mortgage Securities, Inc., Merrill Lynch, Pierce, Fenner & Smith, Inc., Merrill Lynch Mortgage Investors, Inc., Asset Backed Funding Corporation, RBS Securities, Inc., Financial Asset Securities Corp., Countrywide Securities Corporation, CWABS, Inc., CWALT, Inc., J.P. Morgan Securities, Inc., J.P. Morgan Acceptance Corporation I, Bear Stearns Asset Backed Securities I LLC, Long Beach Securities Corp., Washington Mutual Mortgage Securities Corp., SACO I Inc., Structured Asset Mortgage Investments II Inc., Residential Funding Securities, LLC, Residential Accredit Loans, Inc., Residential Asset Mortgage Products, Inc., Residential Asset Securities Corporation, HSBC Securities (USA), Inc., HSI Asset Securitization Corporation, FBR Securitization, Inc., FBR Capital Markets & Co., Ameriquest Mortgage Securities, Inc., Argent Securities, Inc., Park Place Securities, Inc., Novastar Mortgage Funding Corporation, Aegis Asset Backed Securities Corporation, Nationstar Funding LLC, Stanwich Asset Acceptance Company LLC, Deutsche Bank Securities, Inc. and Ace Securities Corp. will take the deposition upon oral examination of Plaintiff Cambridge Place Investment Management, Inc. ("CPIM") on November __, 2010 at 9:30 a.m., or such other time as is agreed upon, at the offices of Greenberg Traurig, LLP, One International Place, 20th Floor, Boston, Massachusetts, 02110.

Examination will be directed to the matters identified in Schedule A attached hereto. Pursuant to Rule 30(b)(6), CPIM is directed to designate one or more officers, directors, managing agents, or other persons who consent and are knowledgeable to testify on its behalf with respect to each of the subject matters set forth in Schedule A attached hereto, and the person(s) so designated shall be required to testify as to each of those topics known or reasonably available to CPIM.

The deposition will be recorded by stenographic, sound, and/or visual means.

Dated: October 18, 2010

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SCHEDULE A

DEFINITIONS

This document incorporates the definitions set forth in Rule 26.5(c) of the Local Rules of the United States District Court for the District of Massachusetts. In addition, the following definitions apply:

1. As used herein, the terms “relating to,” “relate to,” “related,” “concerning,” “supporting,” and any similar terms shall mean – unless otherwise indicated – having any relationship or connection to, concerning, being connected to, commenting on, responding to, containing, evidencing, showing, memorializing, describing, analyzing, reflecting, pertaining to, comprising, constituting, or otherwise establishing any reasonable, logical, or causal connection.
2. “You” or “CPIM” means Plaintiff Cambridge Place Investment Management Inc. and any parent, subsidiary or other affiliate (each a “CPIM Entity”) and any principal, officer, director, employee or agent of any CPIM Entity.
3. “Complaint” means the Complaint filed in the instant action by CPIM in the Superior Court of the Commonwealth of Massachusetts, captioned Cambridge Place Investment Management Inc. v. Morgan Stanley & Co., Inc., et al., Civil Action No. 10-274.
4. “Foreign Hedge Funds” means collectively the nine entities referenced in Paragraph 12 of the Complaint, which include: Caliber Global Investment Ltd.; CAMBER 3 PLC; CAMBER 4 PLC; CAMBER 5 Ltd.; CAMBER 7 PLC; CPIM Structured Credit Fund 20 LP; CPIM Structured Credit Fund 500 LP; CPIM Structured Credit Fund 1000 LP; and CPIM Structured Credit Fund 1500 LP.

5. “Caliber” means Caliber Global Investment Ltd. and any parent, subsidiary or other affiliate (each a “Caliber Entity”) and any principal, officer, director, employee or agent of any Caliber Entity.

6. “CAMBER 3” means CAMBER 3 PLC and any parent, subsidiary or other affiliate (each a “CAMBER 3 Entity”) and any principal, officer, director, employee or agent of any CAMBER 3 Entity.

7. “CAMBER 4” means CAMBER 4 PLC and any parent, subsidiary or other affiliate (each a “CAMBER 4 Entity”) and any principal, officer, director, employee or agent of any CAMBER 4 Entity.

8. “CAMBER 5” means CAMBER 5 Ltd. and any parent, subsidiary or other affiliate (each a “CAMBER 5 Entity”) and any principal, officer, director, employee or agent of any CAMBER 5 Entity.

9. “CAMBER 7” means CAMBER 7 PLC and any parent, subsidiary or other affiliate (each a “CAMBER 7 Entity”) and any principal, officer, director, employee or agent of any CAMBER 7 Entity.

10. “CPIM 20” means CPIM Structured Credit Fund 20 LP and any parent, subsidiary or other affiliate (each a “CPIM 20 Entity”) and any principal, officer, director, employee or agent of any CPIM 20 Entity.

11. “CPIM 500” means CPIM Structured Credit Fund 500 LP and any parent, subsidiary or other affiliate (each a “CPIM 500 Entity”) and any principal, officer, director, employee or agent of any CPIM 500 Entity.

12. “CPIM 1000” means CPIM Structured Credit Fund 1000 LP and any parent, subsidiary or other affiliate (each a “CPIM 1000 Entity”) and any principal, officer, director, employee or agent of any CPIM 1000 Entity.

13. “CPIM 1500” means CPIM Structured Credit Fund 1500 LP and any parent, subsidiary or other affiliate (each a “CPIM 1500 Entity”) and any principal, officer, director, employee or agent of any CPIM 1500 Entity.

14. “Certificates” means the 197 residential mortgage-backed securities which are the subject of the Complaint and referenced in Appendices A through P of the Complaint.

15. “Purported Assignments” means the alleged exclusive assignments to CPIM of all claims of the Foreign Hedge Funds relating to the offer and sale of the Certificates, as referenced in Paragraph 13 of the Complaint.

16. In construing the Matters of Examination below, the following rules of construction apply:

- a. Number: The use of the singular form of any word includes the plural and vice versa.
- b. All/Any: “All” and “Any” mean “any and all.”
- c. And/Or: “And” includes “or” and “or” includes “and.”
- d. Each/Every: “Each” includes “every” and “every” includes “each.”

MATTERS OF EXAMINATION

1. The Purported Assignments, including: (i) any communications between or among CPIM and any of the Foreign Hedge Funds, or within CPIM, concerning the Purported Assignments; (ii) when the Purported Assignments were negotiated and executed; (iii) the economic terms of the Purported Assignments; and (iv) the parties' intent in entering into the Purported Assignments.

2. The purchase of the Certificates, including which entities hold now or have held an interest in the Certificates, and the role, if any, played by CPIM in connection with each purchase.